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Alexandra Harwin, Partner Co-Chair of National Title VII Practice (646) 401-0475 aharwin@sanfordheisler.com Sanford Heisler Sharp, LLP

1350 Avenue of the Americas, Floor 31 New York, NY 10019 Telephone: (646) 402-5650 Fax: (646) 402-5651 www.sanfordheisler.com

New York | Washington D.C. | San Francisco | San Diego | Nashville | Baltimore

April 30, 2020

VIA ECF

The Honorable Katharine H. Parker U.S. District Court for the Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007

Re: Robinson v. De Niro and Canal Productions, Inc., No. 1:19-cv-09156 (LJL) (KHP)

Dear Judge Parker:

This firm represents Plaintiff Graham Chase Robinson. This joint status letter is submitted on behalf of all parties as directed by the Court at the last status conference.

Since the last status conference, the parties have worked diligently to advance discovery in this matter. The parties have finalized and submitted to the Court a Stipulation and Proposed Order Regarding Production of Electronically Stored Information. The parties have continued to identify ESI custodians and data sources, have conferred regarding temporal parameters for ESI searches, and have agreed to run various ESI search terms. Plaintiff timely served her objections and responses to Defendants' initial discovery requests. The parties have exchanged correspondence identifying discovery disputes and are in the process of meeting and conferring in order to try to resolve these discovery disputes without the need for Court intervention.

As the meet-and-confer process remains ongoing, the parties do not have any issues to bring to the Court's attention at this time.

Respectfully submitted,

Alexandrà Harwin